

DOE ORDER #

95-RF-07987

DIST.	LTR	ENC
BENSUSSEN, S.		
BUHL, T.		
CARD, R. G.		
MANI, V.		
MARTINEZ, L.		
MCKAY, B.		
O'BRIEN, G.		
TUOR, N.		
VOORHEIS, G.		
WALLER, C.		

HEDAHL, T. G.	X	X
HILL, J. A.		
SHELTON, D. C.		
WHALEY, D. L.		

BOYD, R. H.		
DETAMORE, J. A.		
DORR, K. A.		
HAHN, S. J.	X	X
KENNEDY, C. E.		
LAHOUD, R. G.		
POTTER, G. L.		
SIEBEN, A. K.		
STEINAUER, A. T.		
WIEMELT, K. L.		

CORRES. CTRL	X	X
TRAFFIC		
ADMIN. REC.		
PATS		

CLASSIFICATION:		
UCNI		
UNCLASSIFIED		
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER  
SIGNATURE

Dr. Class. Rev. Waiver  
by Class. Office  
Date: 10-13-95

IN REPLY TO RF CC NO:

None

ACTION ITEM STATUS

PARTIAL/OPEN  
CLOSED

LTR APPROVALS: SK  
TJ

ORIG & TYPIST INITIALS

SJH :kam

RF-46469 (REV. 7/95)



October 13, 1995

95-RF-07987

Jessie M. Roberson, Assistant Manager  
Environmental Restoration  
DOE, RFFO

Attn: Kurt Muenchow

WETLAND MITIGATION VARIANCE FOR THE PASSIVE SEEP INTERCEPTION AND  
TREATMENT SYSTEM CONSTRUCTION ACTIVITY IN OPERABLE UNIT 7 (OU 7) - TGH-306-9:

Action: Forward the revised Wetland Assessment to Patricia Powell, Department of Energy, Rocky  
Flats Field Office (DOE, RFFO) Environmental Guidance Division

This letter transmits two copies of the wetland assessment for the passive seep interception and  
treatment system for OU 7.

The 10 CFR Part 1022 requirements have been satisfied with the publication of the Notice of  
Involvement in the Wednesday, January 27, 1993, Federal Register and completion of the enclosed  
wetland assessment. The wetland assessment should be transmitted to Patricia Powell of  
DOE, RFFO Environmental Guidance Division.

During an OU 7 Agency Interface meeting held on August 15, 1994, the Environmental Protection  
Agency (EPA) representative, Arturo Duran, stated that wetland mitigation for the area disturbed during  
construction of the seep interception and treatment system would not be required separately and  
should occur with wetland mitigation for the Interim Measure/Interim Remedial Action. He also stated  
that wetland mitigation must be completed prior to the start of the Interim Measure construction.

The passive seep interception and treatment system will be constructed before the mitigation bank is  
developed and mitigation will have to be achieved either by mitigation at the site north of the Stanley  
Lake Protection Project or combined with mitigation for the final landfill closure.

Either option will require approval by the EPA's Waste Management Division as the Clean Water Act  
is delegated to this division per the Comprehensive, Environmental, Response Compensation, and  
Liability Act.

If you have any questions, please contact Stephen Hahn, of my staff, at extension 9888.

T. G. Hedahl  
T. G. Hedahl, Director  
ER/WM&I Operations

SJH:kam

Orig. and 1 cc - J. M. Roberson

Enclosure:  
As Stated

cc: (w/o Enclosure)  
J. D. Krause - RMRS  
T. M. Lindsay - "

P. J. Martin - RMRS  
E. C. Mast - "

L. J. Peterson-Wright - RMRS  
D. E. Steffen - "

Kaiser-Hill Company, L.L.C.  
Courier Address: Rocky Flats Environmental Technology Site, State Hwy. 93 and Cactus, Rocky Flats, CO 80007 • 303.966.7000  
Mailing Address: P.O. Box 464, Golden, Colorado 80402-0464

2/4

RF/ER-95-0099.UN



## WETLAND ASSESSMENT FOR OPERABLE UNIT 7 ACCELERATED ACTION



October 1995

## **Wetland Assessment for Operable Unit Seven**

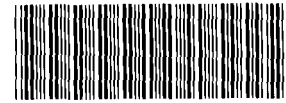
### **Accelerated Action**

#### **1.0 Project Description**

The Department of Energy proposes a Fall 1995 construction project at the Rocky Flats Environmental Technology Site, located north of Golden, Colorado, portions of which would take place in wetlands. The project requires construction of a passive seep interception and treatment system to collect and treat water emanating from the east face of the Present Landfill (named Individual Hazardous Substance Site 114) in Operable Unit Seven (see Photograph, Present Landfill and East Landfill Pond). The objective of this accelerated action is to reduce contaminant loading to the East Landfill Pond by striving to meet chemical-specific *Applicable or Relevant and Appropriate Requirement* (ARAR) concentration limits for the specific pollutants. Water would be intercepted at the seep (SW097) with a temporary system (see Figure 1), including 3-inch perforated polyvinyl chloride (PVC) collection pipe, drain rock, and a precast manhole base section. A 45yd<sup>2</sup> yard area in the vicinity of the seep will be excavated to an approximate depth of 2-5 feet (to the weathered bedrock) and the manhole base section, drain rock, and collection pipe will be emplaced. The collection pipe will be backfilled with drain rock to direct the seep flow to the manhole base section, which in turn acts as a flow and head equalizing basin. From the concrete manhole, a 3-inch solid PVC double-contained pipe, offset at 45 degrees, will direct the intercepted seep to a series of carbon-based reactor tanks housed in a steel tank. The discharge pipe is 2-inch solid PVC and treated water is discharged from the steel tank directly to the pond. The pond will be maintained at an elevation of 5,919 feet or lower to allow for efficient operation of the interception and treatment system. A temporary dike consisting of hay bales, liner material, and rip rap will be placed upstream of the seep to prevent surface water runoff and sediments from entering the seep interception system (see Figure 2).

The interception and treatment system is scheduled to operate until July 1997, at which time Interim Measure construction will begin.

## ER/WM&amp;I DDT



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95RF07987

**Source/Driver:** (Name & Number from ISP, IAG milestone, Mgmt. Action, Corres. Control, etc.)

**Closure #:** (Outgoing Correspondence Control #, if applicable)

**Due Date**

L. J. Peterson-Wright  
**Originator Name**

E. C. Mast, D. E. Steffen, A. M. Parker  
**Contractor Manager(s)**

S. J. Hahn

**Kaiser-Hill Program Manager(s)**

T. G. Hedahl

**Kaiser-Hill Director**

DOCUMENT CLASSIFICATION  
REVIEW WAIVER PER  
CLASSIFICATION OFFICE

**Document Subject:**

TRANSMITTAL OF WETLAND ASSESSMENT FOR THE PASSIVE SEEP INTERCEPTION AND TREATMENT SYSTEM CONSTRUCTION ACTIVITY IN OPERABLE UNIT SEVEN

(95-RM-ER-0073-KH)

AMP-075-95

RMRS Record 22.053F

This letter transmits four copies of the wetland assessment for the passive seep interception and treatment system for Operable Unit Seven (OU) 7. Two copies are for Kaiser-Hill and two copies are for the Department of Energy, Rocky Flats Field Office.

The 10 CFR Part 1022 requirements have been satisfied with the publication of the Notice of Involvement in the Wednesday, January 27, 1993, Federal Register and completion of the enclosed wetland assessment. The wetland assessment should be transmitted to Patricia Powell of the Environmental Guidance Division.

During an Operable Unit Seven Agency Interface meeting held August 15, 1994, the Environmental Protection Agency representative, Arturo Duran, stated that wetland mitigation for the area disturbed during construction of the Seep Interception and Treatment system would not be required separately and should occur with wetland mitigation for the Interim Measure/Interim Remedial Action. He also stated that wetland mitigation must be completed prior to the start of the Interim Measure construction.

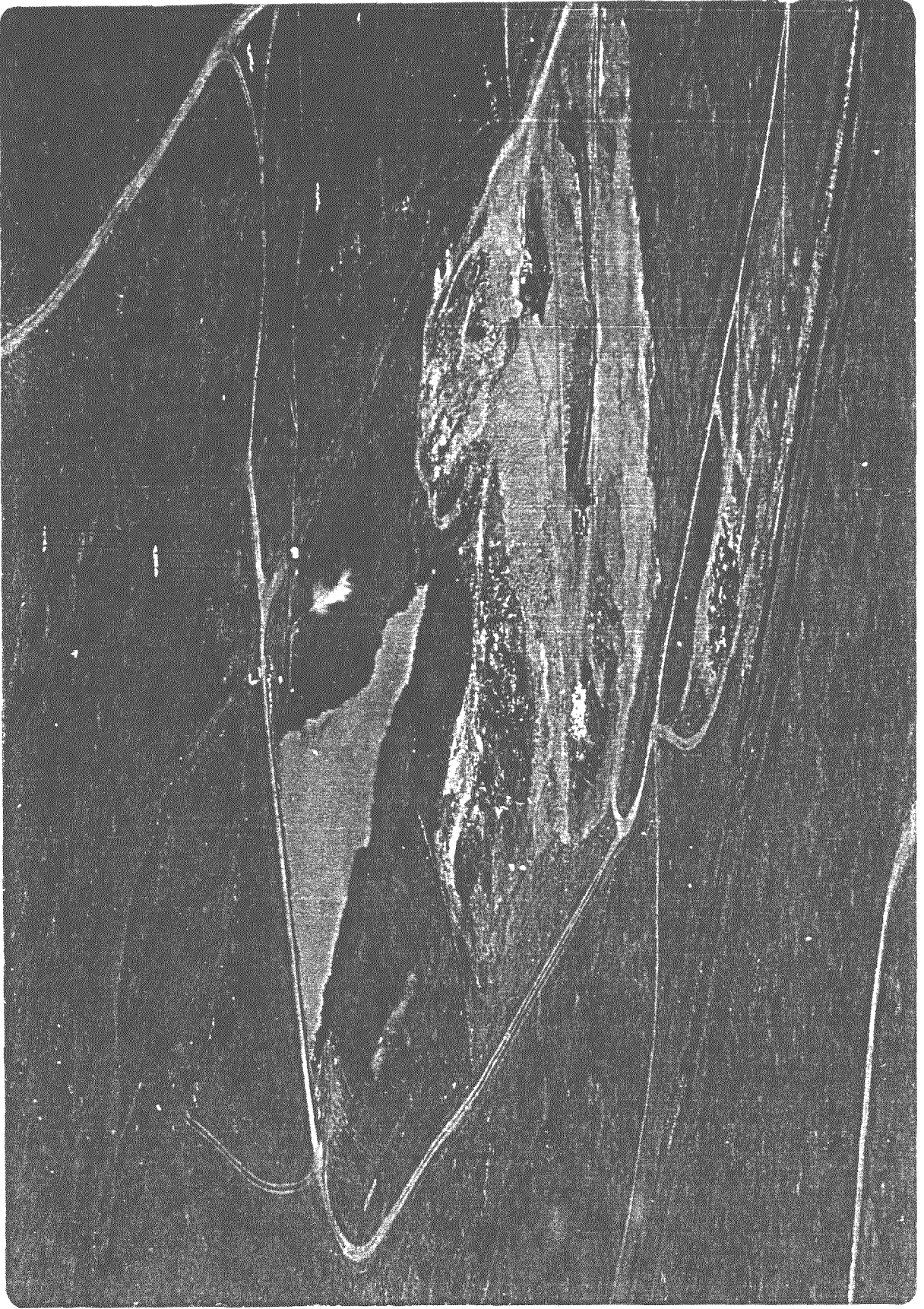
The passive seep interception and treatment system will be constructed before the mitigation bank is developed and mitigation will have to be achieved either by mitigation at the site north of the Standley Lake Protection Project or combined with mitigation for the final landfill closure.

Either option will require approval by EPA's Waste Management Division as Clean Water Act is delegated to this division per CERCLA.

If you have questions concerning this transmittal, please contact Ed Mast, of my staff, at extension 8589.

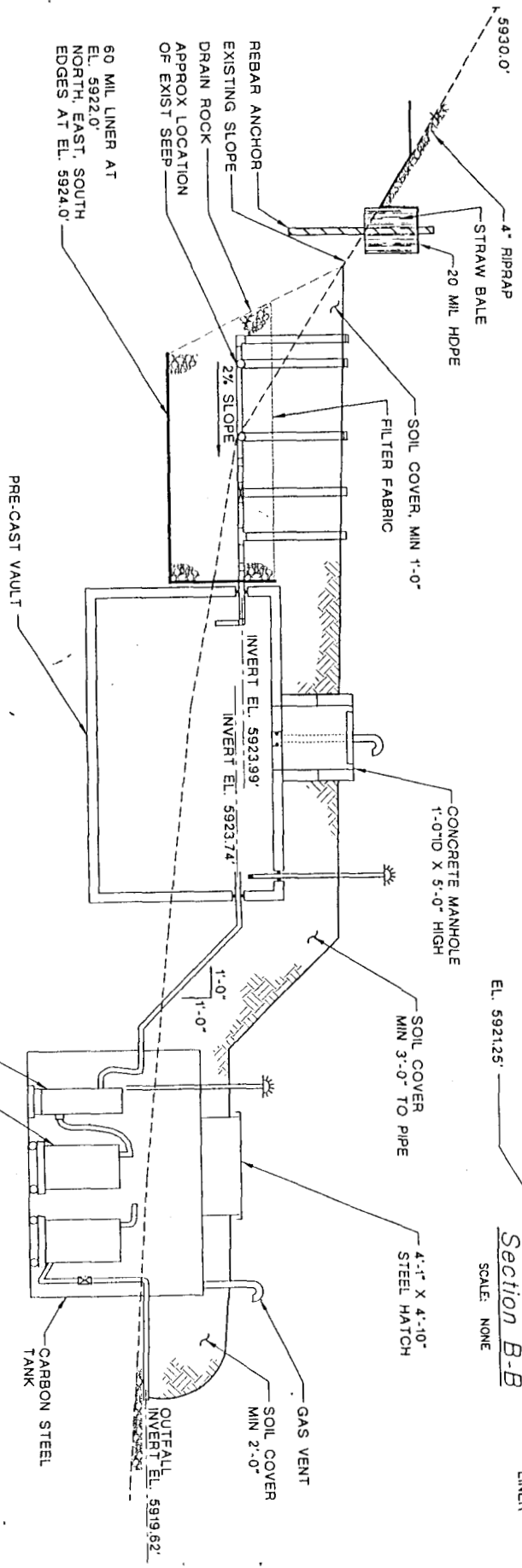
cc:  
S. J. Hahn                      J. D. Krause                      P. J. Martin                      A. M. Parker  
T. G. Hedahl                      T. M. Lindsay                      E. C. Mast                      L. J. Peterson-Wright

ADMIN RECCRD



Present Landfill and East Landfill Pond (June 1991)

6/9

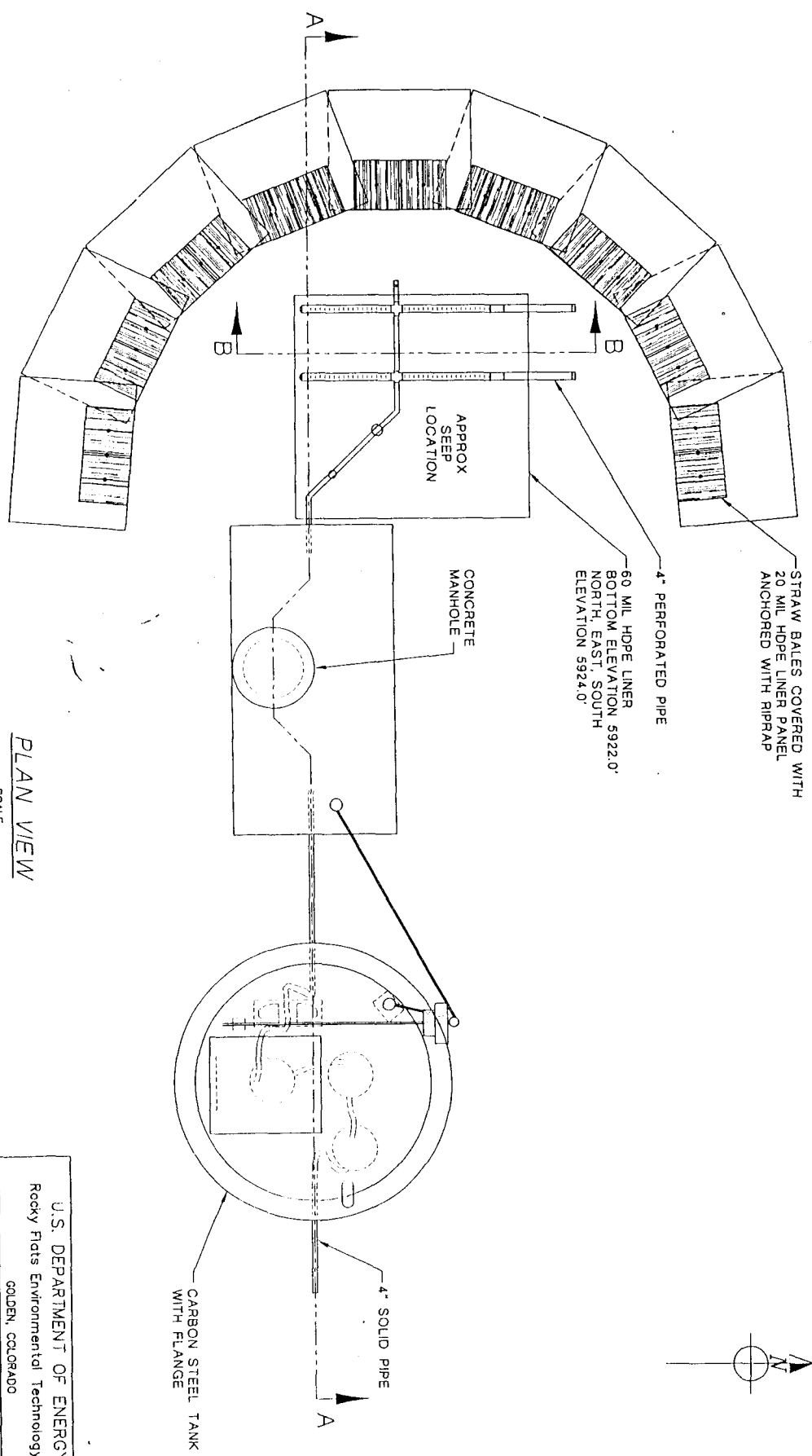


**Section A-A**  
SCALE  
0 2' 4'  
Scale in Feet

**Section B-B**  
SCALE: NONE

U.S. DEPARTMENT OF ENERGY	
Rocky Flats Environmental Technology Site	
GOLDEN, COLORADO	
Passive Collection and Treatment System	
Cross Sections	
Wetland Assessment	Operable Unit No. 7
October 1995	Figure 1

b/c



The no action alternative is the only other action considered feasible for this project. The no action alternative will result in no adverse impacts to wetland areas because no construction activities will be enacted. However, because the seep contains a listed waste (FO39) as defined by the Code of Federal Regulations, Title 40, Part 261.31, "Hazardous Waste from Non-Specific Sources" it must be collected and treated.

### 3.0 Alternatives

The proposed activities will have only negligible positive or negative, direct or indirect, and short- or long-term effects on the survival, quality, or natural and beneficial values of the wetlands.

Construction of the seep interception and treatment system would remove less than 45 yd<sup>2</sup> of wetland vegetation to allow for excavation and placement of the intercept system. Also, as a result of backhoe access and operational maneuvering, some flattening of wetland vegetation is expected to occur. The seep interception and treatment system may also disrupt the local hydrology by removing water that would otherwise remain in the environment, and that could result in eventual encroachment of upland vegetation.

### 2.0 Wetlands Effects

The East Landfill Pond and some areas along the pond edge exhibit typical wetland characteristics. Part of the seep interception and treatment system must be located in the wetland area at the upstream end of the pond, specifically, the intercept system, which captures the seep flow. Because of this requirement, Title 10, Part 1022, "Compliance with Floodplain/Wetlands Environmental Review Requirements" has been identified as a potential ARA. For this project, mitigation of wetland effects would be deferred and addressed in the Landfill Closure Interim Measure/Interim Response Action Decision Document and Closure Plan.



b/c

#### 4.0 Mitigation of Wetland Impacts

The impact on wetland will be minimized by offsetting the treatment portion of the system from the intercept portion by 45 degrees, which will avoid placing the treatment system in wetlands. In addition, existing roads will be used where possible and access to the work site will be limited to authorized personnel only.